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LOS ANGELES WORLD AIRPORTS

11 Attorneys for Cross-Defendants City of Los
12 Angeles and Los Angeles World Airports

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **COUNTY OF LOS ANGELES**
15

16 Coordination Proceeding

Judicial Council Coordination
Proceeding No. 4408

17 ANTELOPE VALLEY GROUNDWATER
18 CASES,

LEAD CASE: LASC Case No. BC 325201

19 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co.

**SETTLING PARTIES' AMENDED
REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF SETTLING PARTIES'
OPPOSITION TO THE ZAMRZLAS'
MOTIONS TO SET ASIDE THE
JUDGMENT**

20 Los Angeles County Waterworks District No.
21 40 v. Diamond Farming Co.

Date: March 15-16, 2023
Time: 9:00 a.m.
Dept.: 3

22 Wm Bolthouse Farms, Inc. v. City of
Lancaster

23 Diamond Farming Co. v. City of Lancaster

The Hon. Jack Komar, Dept. 17
Santa Clara Case No. 105 CV 049053

24 Diamond Farming Co. v. Palmdale Water
25 District,

Riverside County Superior Court
Case No. RIC 344436
Case No. RIC 344668
Case No. RIC 353840

26 AND RELATED ACTIONS

Kern County Superior Court Case
No. S-1500-CV-254348

1 In support of their Opposition to the Zamrzlas' Motions to Set Aside or Modify the Judgment,
2 the City of Los Angeles (Los Angeles World Airports), Grimmway Enterprises, Palmdale Water
3 District, County Sanitation Districts of Los Angeles County Nos. 14 and 20 (collectively, "Settling
4 Parties"), and pursuant to California Evidence Code sections 452 and 453, and California Rules of
5 Court, Rule 3.1306(c), hereby request that the Court take judicial notice of the below listed court
6 documents. The Settling Parties provided most of these court documents in their October 12, 2022,
7 Request for Judicial Notice. For administrative ease the Settling Parties hereby submit this amended
8 request, which consolidates the Settling Parties' October 12, 2022, Request for Judicial Notice with
9 the court document exhibits on the Settling Parties and Watermaster's Joint Exhibit List and Joint
10 Rebuttal Exhibit List filed on February 22, 2023, and March 1, 2023, respectively. The Settling Parties
11 amended request for judicial notice includes the following:

12 1. The Declaration of Stefanie D. Hedlund re Status of Service of Process filed by Los
13 Angeles County Waterworks District No. 40 and Rosamond Community Services District in the
14 *Antelope Valley Groundwater Cases* (JCCP No. 4408) on August 7, 2008, Glo-Trans No. 1750, a true
15 and correct copy of which is attached hereto as Exhibit 1.

16 2. The Declaration of Jeffrey V. Dunn re Status of Service of Process filed by Los
17 Angeles County Waterworks District No. 40 and Rosamond Community Services District in the
18 *Antelope Valley Groundwater Cases* (JCCP No. 4408) on September 12, 2008, Glo-Trans No. 2011, a
19 true and correct copy of which is attached hereto as Exhibit 2.

20 3. Plaintiff Willis' Revised Order Governing Class Notice filed by the Court in the
21 *Antelope Valley Groundwater Cases* (JCCP No. 4408) on December 16, 2008, Glo-Trans No. 2314, a
22 true and correct copy of which is attached hereto as Exhibit 3.

23 4. 2009 Small Pumper Class action notice filed by Richard A. Wood in the *Antelope*
24 *Valley Groundwater Cases* (JCCP No. 4408) on June 17, 2009, Glo-Trans No. 2903, a true and correct
25 copy of which is attached hereto as Exhibit 4.

26 5. Order Approving Revised Class Notice for Small Pumper Class Action filed by the
27 Court in the *Antelope Valley Groundwater Cases* (JCCP No. 4408) on March 13, 2009, Glo-Trans No.
28 2524, a true and correct copy of which is attached hereto as Exhibit 5.

1 6. Declaration of Jeffrey V. Dunn re Status of Service of Process filed by Los Angeles
2 County Waterworks District No. 40 and Rosamond Community Services District in the *Antelope*
3 *Valley Groundwater Cases* (JCCP No. 4408) on March 19, 2010, Glo-Trans No. 3489, a true and
4 correct copy of which is attached hereto as Exhibit 6.

5 7. 2013 Small Pumper Class action notice of partial settlement filed by Richard A. Wood
6 in the *Antelope Valley Groundwater Cases* (JCCP No. 4408) on October 7, 2013, Glo-Trans No. 7188,
7 a true and correct copy of which is attached hereto as Exhibit 7.

8 8. Order Granting Preliminary Approval of Class Action Partial Settlement and Notice to
9 the Class filed by the Court in the *Antelope Valley Groundwater Cases* (JCCP No. 4408) on October
10 25, 2013, Glo-Trans No. 7310, a true and correct copy of which is attached hereto as Exhibit 8.

11 9. Declaration of Jennifer M. Keough regarding Notice Dissemination filed by Richard A.
12 Wood in the *Antelope Valley Groundwater Cases* (JCCP No. 4408) on December 3, 2013, Glo-Trans
13 No. 7678, a true and correct copy of which is attached hereto as Exhibit 9.

14 10. Supplemental Declaration of Michael D. McLachlan in Support of Motion for Final
15 Approval of Partial Class Settlement filed by Richard A. Wood in the *Antelope Valley Groundwater*
16 *Cases* (JCCP No. 4408) on December 3, 2013, Glo-Trans No. 7679, a true and correct copy of which
17 is attached hereto as Exhibit 10.

18 11. Declaration of Michael D. McLachlan regarding Class Membership After Partial
19 Settlement and Exhibit 4 attached thereto filed by Richard A. Wood in the *Antelope Valley*
20 *Groundwater Cases* (JCCP No. 4408) on January 5, 2014, Glo-Trans No. 7858, a true and correct
21 copy of which is attached hereto as Exhibit 11.

22 12. 2015 Small Pumper Class action notice of settlement filed by Richard A. Wood in the
23 *Antelope Valley Groundwater Cases* (JCCP No. 4408) on March 4, 2015, Glo-Trans No. 9623, a true
24 and correct copy of which is attached hereto as Exhibit 12.

25 13. Order Granting Preliminary Approval of Small Pumper Class Action Settlement and
26 Notice to the Class filed by the Court in the *Antelope Valley Groundwater Cases* (JCCP No. 4408) on
27 April 10, 2015, Glo-Trans No. 9752, a true and correct copy of which is attached hereto as Exhibit 13.

28 14. Declaration of Jennifer M. Keough regarding Dissemination of Small Pumper Notice

1 filed by Richard A. Wood in the *Antelope Valley Groundwater Cases* (JCCP No. 4408) on June 4,
2 2015, Glo-Trans No. 9968, a true and correct copy of which is attached hereto as Exhibit 14.

3 15. Declaration of Michael D. McLachlan re: Publication of Summary Class Notice of
4 Settlement filed by Richard A. Wood in the *Antelope Valley Groundwater Cases* (JCCP No. 4408) on
5 June 4, 2015, Glo-Trans No. 9969, a true and correct copy of which is attached hereto as Exhibit 15.

6 16. Declaration of Kevin Berg regarding Dissemination of Small Pumper Class Action
7 Notice filed by Los Angeles County Waterworks District No. 40 in the *Antelope Valley Groundwater*
8 *Cases* (JCCP No. 4408) on October 11, 2022, Glo-Trans No. 12374, a true and correct copy of which
9 is attached hereto as Exhibit 16.

10 17. Long Valley Road L.P.'s Notice of Motion and Motion for Leave to Intervene in
11 Judgment; Memorandum of Points and Authorities in Support filed by Long Valley Road, L.P. in the
12 *Antelope Valley Groundwater Cases* (JCCP No. 4408) on October 9, 2018, Glo-Trans No. 11811, a
13 true and correct copy of which is attached hereto as Exhibit 17.

14 18. Declaration of Bruce E. Pherson Jr. in Support of Long Valley Road L.P.'s Motion to
15 Intervene in Judgment, filed by Long Valley Road, L.P. in the *Antelope Valley Groundwater Cases*
16 (JCCP No. 4408) on October 9, 2018, Glo-Trans No. 11808, a true and correct copy of which is
17 attached hereto as Exhibit 18.

18 19. Declaration of Andrew W. Homer in Support of Long Valley Road L.P.'s Motion to
19 Intervene in Judgment filed by Long Valley Road, L.P. in the *Antelope Valley Groundwater Cases*
20 (JCCP No. 4408) on October 9, 2018, Glo-Trans No. 11810, a true and correct copy of which is
21 attached hereto as Exhibit 19.

22 20. Proposed Order Re: Long Valley Road L.P.'s Motion for Leave to Intervene in
23 Judgment filed by Long Valley Road, L.P. in the *Antelope Valley Groundwater Cases* (JCCP No.
24 4408) on October 9, 2018, Glo-Trans No. 11809, a true and correct copy of which is attached hereto
25 as Exhibit 20.

26 21. Joint Opposition to Motion of Long Valley Road, L.P. for Leave to Intervene in
27 Judgment; Objections to the Declarations of Andrew W. Homer and Bruce E. Pherson, Jr., Filed in
28 Support of the Motion; and Objection to the Proposed Order on the Motion, filed by Granite

1 Construction Company, Bolthouse Properties, LLC, Grimmway Enterprises, Inc., Wm. Bolthouse
2 Farms, Inc., Diamond Farming Company, Lapis Land Company, LLC, Tejon Ranchcorp, Crystal
3 Organic Farms LLC, City of Los Angeles, Los Angeles World Airports, County Sanitation Districts
4 Nos. 14 and 20 of Los Angeles County in the *Antelope Valley Groundwater Cases* (JCCP No. 4408)
5 on October 18, 2018, Glo-Trans No. 11813, a true and correct copy of which is attached hereto as
6 Exhibit 21.

7 22. Watermaster's Opposition to Long Valley Road, L.P.'s Motion for Leave to Intervene
8 in Judgment; Declarations of Craig A. Parton, Michael D. McLachlan, and Jeffrey V. Dunn in Support
9 Thereof, filed by Craig Parton in the *Antelope Valley Groundwater Cases* (JCCP No. 4408) on
10 October 19, 2018, Glo-Trans No. 11814, a true and correct copy of which is attached hereto as Exhibit
11 22.

12 23. Notice of Errata to Watermaster's Opposition to Long Valley Road, L.P.'s Motion for
13 Leave to Intervene in Judgment; Declarations of Craig A. Parton, Michael D. McLachlan, and Jeffrey
14 V. Dunn in Support Thereof, filed by Craig Parton in the *Antelope Valley Groundwater Cases* (JCCP
15 No. 4408) on October 19, 2018, Glo-Trans No. 11819, a true and correct copy of which is attached
16 hereto as Exhibit 23.

17 24. Watermaster's Request for Judicial Notice in Support of its Opposition to Long Valley
18 Road, L.P.'s Motion for Leave to Intervene in Judgment; Exhibits 1-5, filed by Craig Parton in the
19 *Antelope Valley Groundwater Cases* (JCCP No. 4408) on October 19, 2018, Glo-Trans No. 11815, a
20 true and correct copy of which is attached hereto as Exhibit 24.

21 25. [Proposed] Order Denying Long Valley Road, L.P.'s Motion for Leave to Intervene in
22 Judgment, filed by Craig Parton in the *Antelope Valley Groundwater Cases* (JCCP No. 4408) on
23 October 19, 2018, Glo-Trans No. 11816, a true and correct copy of which is attached hereto as Exhibit
24 25.

25 26. Public Water Supplier Opposition to Long Valley Road, L.P.'s Motion for Leave to
26 Intervene in Judgment, filed by Los Angeles County Waterworks District No. 40 in the *Antelope*
27 *Valley Groundwater Cases* (JCCP No. 4408) on October 19, 2018, Glo-Trans No. 11817, a true and
28 correct copy of which is attached hereto as Exhibit 26.

1 27. Long Valley Road, L.P.’s Reply in Support of Motion to Intervene in Judgment, filed
2 by Long Valley Road, L.P., in the *Antelope Valley Groundwater Cases* (JCCP No. 4408) October 25,
3 2018, Glo-Trans No. 11825, a true and correct copy of which is attached hereto as Exhibit 27.

4 28. Order Denying Long Valley Road’s Motion to Intervene filed by Craig A. Parton,
5 Price, Postel & Parma LLP, in *the Antelope Valley Groundwater Cases* (JCCP No. 4408) on
6 November 9, 2018, Glo-Trans No. 11833, a true and correct copy of which is attached hereto as
7 Exhibit 28.

8 29. January 22, 2019 invoice from the Watermaster to Johnny Zamrzla for 2018 RWAs
9 imposed by the Antelope Valley Watermaster, and attached as Exhibit E to Watermaster’s Motion for
10 Monetary and Injunctive Relief filed by Craig A. Parton in *the Antelope Valley Groundwater Cases*
11 (JCCP No. 4408) on September 29, 2021, Glo-Trans No. 12093, a true and correct copy of which is
12 attached hereto as Exhibit 29.

13 30. Pumping data dated March 18, 2019, relating to groundwater pumped by the Zamrzlas
14 in 2018, submitted by the Zamrzla Parties to the Watermaster, and attached as Exhibit A to
15 Watermaster’s Motion for Monetary and Injunctive Relief filed by Craig A. Parton in *the Antelope*
16 *Valley Groundwater Cases* (JCCP No. 4408) on September 29, 2021, Glo-Trans No. 12093, a true and
17 correct copy of which is attached hereto as Exhibit 30.

18 31. Resolution 19-27 of the Antelope Valley Watermaster, and attached as Exhibit D to
19 Watermaster’s Motion for Monetary and Injunctive Relief filed by Craig A. Parton in *the Antelope*
20 *Valley Groundwater Cases* (JCCP No. 4408) on September 29, 2021, Glo-Trans No. 12093, a true and
21 correct copy of which is attached hereto as Exhibit 31.

22 32. Attorney billing ledger for Price, Postel & Parma LLP, and attached as Exhibit C to
23 Watermaster’s Motion for Monetary and Injunctive Relief filed by Craig A. Parton in *the Antelope*
24 *Valley Groundwater Cases* (JCCP No. 4408) on September 29, 2021, Glo-Trans No. 12093, a true and
25 correct copy of which is attached hereto as Exhibit 32.

26 33. Memorandum dated September 5, 2019 from Todd Groundwater to Craig Parton “Re:
27 Groundwater Production on Zamrzla Parcels,” and attached as Exhibit B to Watermaster’s Motion for
28 Monetary and Injunctive Relief filed by Craig A. Parton in *the Antelope Valley Groundwater Cases*

1 (JCCP No. 4408) on September 29, 2021, Glo-Trans No. 12093, a true and correct copy of which is
2 attached hereto as Exhibit 33.

3 34. Declaration of Jeffrey V. Dunn in support of Watermaster's Reply to Zamrzla's
4 Opposition to Motion for Declaratory and Injunctive Relief, filed with this Court as an attachment to
5 the Watermaster's Reply brief, filed by Craig A. Parton in *the Antelope Valley Groundwater Cases*
6 (JCCP No. 4408) on December 3, 2021, Glo-Trans No. 12153, a true and correct copy of which is
7 attached hereto as Exhibit 34.

8 35. Other: Minute Order from July 9, 2012 (Amended; reflects the attendance of additional
9 counsel) filed by the Court in *the Antelope Valley Groundwater Cases* (JCCP No. 4408) on July 18,
10 2012, Glo-Trans Number 5192, a true and correct copy of which is attached hereto as Exhibit 35.

11 36. Other: Minute Order from November 9, 2012 (amended to include list of personal
12 appearances) filed by the Court in *the Antelope Valley Groundwater Cases* (JCCP No. 4408) on
13 November 9, 2012, Glo-Trans No. 5329, a true and correct copy of which is attached hereto as Exhibit
14 36.

15 37. Judgment: Judgment signed By Judge Komar on 12-23-13 filed by Los Angeles
16 County Waterworks District No. 40 in *the Antelope Valley Groundwater Cases* (JCCP No. 4408) on
17 December 28, 2015, Glo-Trans No. 11020, a true and correct copy of which is attached hereto as
18 Exhibit 37.

19 38. Exhibit A to Judgment attached as Exhibit 2 to the Judgment: Judgment signed By
20 Judge Komar on 12-23-13 filed by Los Angeles County Waterworks District No. 40 in *the Antelope*
21 *Valley Groundwater Cases* (JCCP No. 4408) on December 28, 2015, Glo-Trans No. 11020, a true and
22 correct copy of which is attached hereto as Exhibit 38.

23 39. Exhibit B to Judgment attached as Exhibit 3 to the Judgment: Judgment signed By
24 Judge Komar on 12-23-13 filed by Los Angeles County Waterworks District No. 40 in *the Antelope*
25 *Valley Groundwater Cases* (JCCP No. 4408) on December 28, 2015, Glo-Trans No. 11020, a true and
26 correct copy of which is attached hereto as Exhibit 39.

27 40. Exhibit C to Judgment attached as Exhibit 4 to the Judgment: Judgment signed By
28 Judge Komar on 12-23-13 filed by Los Angeles County Waterworks District No. 40 in *the Antelope*

1 Valley Groundwater Cases (JCCP No. 4408) on December 28, 2015, Glo-Trans No. 11020, a true and
2 correct copy of which is attached hereto as Exhibit 40.

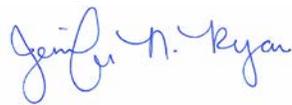
3 41. Exhibit D to Judgment attached as Exhibit 5 to the Judgment: Judgment signed By
4 Judge Komar on 12-23-13 filed by Los Angeles County Waterworks District No. 40 in *the Antelope*
5 Valley Groundwater Cases (JCCP No. 4408) on December 28, 2015, Glo-Trans No. 11020, a true and
6 correct copy of which is attached hereto as Exhibit 41.

7 **REQUEST FOR JUDICIAL NOTICE**

8 The City of Los Angeles (Los Angeles World Airports), Grimmway Enterprises, Palmdale
9 Water District, County Sanitation Districts of Los Angeles County Nos. 14 and 20 (collectively,
10 “Settling Parties”) hereby request that the Court take judicial notice of Exhibits 1-42. Pursuant to
11 Evidence Code sections 452 and 453, the Court may, and on request shall, take judicial notice of
12 records of any court of this state. (Evid. Code § 452(d); 453.) Thus, the Court must take notice of
13 Exhibits 1-42.

14 DATED: March 14, 2023

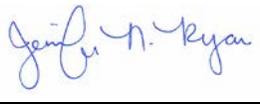
KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation

15
16 By: 

Eric N. Robinson
Jenifer N. Ryan
Attorneys for Defendant CITY OF LOS
ANGELES and
LOS ANGELES WORLD AIRPORTS

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19
20 DATED: March 14, 2023

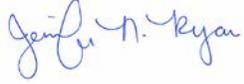
LEBEAU THELEN LLP

21
22 By:  for

Robert G. Kuhs
Attorneys for GRIMMWAY ENTERPRISES

23
24 DATED: March 14, 2023

LAGERLOF, LLP

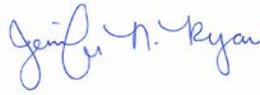
25
26 By:  for

Thomas S. Bunn
Attorneys for PALMDALE WATER DISTRICT

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DATED: March 14, 2023

ELLISON, SCHNEIDER, HARRIS & DONLAN LLP

By:  for _____
Christopher M. Sanders
Attorneys for COUNTY SANITATION
DISTRICTS OF LOS ANGELES COUNTY NOS.
14 AND 20

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SACRAMENTO

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Sacramento, State of California. My business address is 1331 Garden Hwy, 2nd Floor, Sacramento, CA 95833.

On March 14, 2023, I served true copies of the following document(s) described as **SETTLING PARTIES' AMENDED REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF SETTLING PARTIES' OPPOSITION TO THE ZAMRZLAS' MOTIONS TO SET ASIDE THE JUDGMENT** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: By submitting an electronic version of the document(s) to the parties, through the user interface at avwatermaster.org.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 14, 2023, at Sacramento, California.

Sherry Ramirez